

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA *ex rel.*
TINA HAIGHT

Plaintiff-Relator,

v.

RRSA (COMMERCIAL DIVISION), LLC,
et al.,

Defendants.

Civil Action No. 3:16-cv-1975-S

JURY TRIAL DEMANDED

NOTICE OF SETTLEMENT AND JOINT MOTION TO STAY

Plaintiff-Relator Tina Haight (“Haight”), and Defendants RRSA (Commercial Division), LLC, Roofing and Restoration Services of America, LLC, RRSA Commercial Roofing, Inc., Haight Construction Management Services, Inc., Corey S. Sanchez, Jon R. Seymore, Jennifer N. Seymore, and Ronald Scott Nichols (collectively “Defendants”) respectfully file this Notice of Settlement and Joint Motion to Stay (the “Motion”) and, in support thereof, would show as follows:

1. On April 8, 2022, the parties entered into a binding Settlement Term Sheet to resolve all claims in this suit.
2. Under the Settlement Term Sheet, the terms of the Final Settlement Agreement will be finalized and the settlement amount will be owed within thirty (30) days of the Settlement Term Sheet or within thirty (30) days of a Final Settlement Agreement, whichever is later.
3. In order to permit the parties to devote their resources to working with the United States in negotiating an acceptable Final Settlement Agreement, the parties respectfully request the Court abate the Third Amended Scheduling Order (Dkt. # 168), stay all remaining deadlines, and set this matter for status conference to be held via Zoom on Friday, June 3, 2022.

4. This request is made solely for the purpose of expediting settlement and for no other reason. The parties request the Court grant the Motion and enter the accompanying proposed Order.

Dated: April 13, 2022

Respectfully Submitted,

/s/ Darren Nicholson

Darren P. Nicholson
State Bar No. 24032789
dnicholson@burnscharest.com
BURNS CHAREST, LLP
900 Jackson Street, Suite 500
Dallas, Texas 75202
Telephone: (469) 458-9890
Facsimile: (469) 444-5002

and

Christopher A. Payne
State Bar No. 15651500
Chris.Payne@Payne-Alstrin.com
Christina Alstrin
State Bar No. 24068019
Christina.Alstrin@Payne-Alstrin.com
PAYNE ALSTRIN, PLLC
9101 LBJ Freeway, Suite 760
Dallas, Texas 75243
Telephone: (214) 945-1022
Facsimile: (214) 945-1023

**COUNSEL FOR RELATOR TINA
HAIGHT**

/s/ Gretchen McGill

Gretchen L McGill (admitted *pro hac vice*)
gmcgill@ddlgroup.com
Heather Voegelé Anson (admitted *pro hac vice*)
hvoegele@ddlgroup.com
DVORAK LAW GROUP LLC
9500 W Dodge Road Suite 100
Omaha, NE 68114
Telephone: 402-934-4770
Fax: 402-933-9630

Christopher B. Trowbridge
Texas State Bar No. 24008182
christophert@bellnunnally.com
Benjamin L. Riemer
Texas State Bar No. 24065976
briemer@bellnunnally.com
Troy (T.J.) Hales
Texas State Bar No. 24099011
thales@bellnunnally.com
BELL NUNNALLY & MARTIN LLP
2323 Ross Ave., Ste. 1900
Dallas, Texas 75201
Telephone: (214) 740-1400
Telecopier: (214) 740-1499

**COUNSEL FOR DEFENDANTS RRSA
(COMMERCIAL DIVISION), LLC;
ROOFING & RESTORATION
SERVICES OF AMERICA, LLC; RRSA
COMMERCIAL ROOFING, INC.;
HAIGHT CONSTRUCTION
MANAGEMENT SERVICES, INC.;
TURCO CONSTRUCTION INC.;
ANDREW'S ROOFING &
RESTORATION; COREY S. SANCHEZ;
JON R. SEYMORE; JENNIFER N.
SEYMORE AND RONALD SCOTT
NICHOLS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on this day April 13, 2022 via email to all counsel of record.

/s/ Darren Nicholson

Darren Nicholson